

- V. The City of Paramount has perform no additional monitoring within the scope of the NPDES Permit for Los Angeles county.
- VI. The Regional Board has asked for a summary of the effectiveness of the city Storm Water Management program. In a word the current program is not effective because it is too subjective and requires too much manpower to implement. The program should be based on BMP implementation rather than the installation of complicated and maintenance intensive treatment facilities. Without maintenance the treatment facilities being placed will increase rather than decrease the problem we face. As maintenance of these facilities becomes a problem for the property owners it is likely that many of them will be taken off line and bypassed.

**The Board asks for an assessment of the agencies compliance with permit requirements.** Overall I believe that the City program is in full compliance with the permit requirements. The City is performing all required activities, either through its own personnel or through the contract services of the County of Los Angeles, the Principal Permittee. The Commercial inspection program has been slow getting started, but recent communications from the County indicate that the agreement is nearly complete.

**The Board asks for any evaluation methods that your agency use to determine the effectiveness of the Storm Water Management Program.** The City has not hired a consultant to evaluate the program, they have not undertaken any scientific studies or used any statistical analysis to judge the effectiveness of its program. Rather the City has observed the actions of the residents in their daily activity to determine how common practices have changed. These observations include dog walkers, restaurant area maintenance and the general appearance of the public right of way. Based on these non-scientific observations the City has noticed a general change in attitude regarding cleanliness and storm water quality.

**The Board asks for a summary of the strengths and weaknesses of the agency's storm water management program.** The City performs at a level consistent with other municipalities in Los Angeles County. The City believes that it's development review procedures are the strength of its program with the inspection and enforcement of the water quality program being a close second. The weaknesses are focused on the public Education activities. With the installation of the new Public Education Sub Contractor at the County this aspect should improve.

**The Board requests a list of program highlights and accomplishments.** The City considers its collection and logging of all connections to the storm drain system as its biggest accomplishment for the year. The City has documented and input the information into an access Database for ease of use as the screening process begins.

**The Board requests a description of water quality improvements or degradation in your watershed of the past fiscal year.** The City believes that the installation of catch basin inserts is the beginning of the road to water quality improvements in the watershed. All new storm drains built are protected by catch basin inserts and will soon include an excluder for gross solids.

**The Board asks for interagency coordination between cities to improve the storm water management program.** This is an area that can be improved by focusing the Watershed Management committee more on tasks than on updates on various meetings and lawsuits. There are a number of deliverables coming due in the next year that I have not yet seen. I assume that the County is preparing the document, in a vacuum, and that the cities will see the document only at the last minute when no changes can be made.

**The Board requests future plans to improve the agency's storm water management program.** The City is satisfied with its current program and has no intention to change or implement new programs, other than the permit required programs, during the coming year.

**The Board requests any suggestions to improve the effectiveness of the agency's program or the County model programs.** The City has no intention to modify the current program. The City believes that the program is adequate and should not be changed at this time.

**The Board requests that the Agency, on a scale of 1 to 10, rate your municipalities level of compliance with Order No. 01-182.** The City believes that its program, when compared to the other agencies, would be rated at an 8 for implementation of the permit. We do not believe that the public would not support a higher-level equal to that implemented by the City of Santa Monica or other high quality programs.

**The Board requests a list of suggestions the agency has for improve program reporting and assessment.** Be reasonable and rational in the phrasing of the questions. So many of the questions are phrased so that there is no good answer. As an example one of the first questions is "Are existing financial resources sufficient to accomplish all required activities?" The cities are asked to give a yes or no answer to this question. If a City answers yes the Board will come back to the city and ask why they are not doing more to support the Public education program or doing more inspections. The yes answer leaves you open to second guessing on the actual funding levels. The no answer is a problem because it says you are not complying with all programs. Thus every City will answer yes whether they believe that the funding is adequate because they do not want to open the City up to questions of commitment to the program. The report is full of similar questions that do not have a good answer. I believe that the questions need to be reviewed and edited.